

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ELISA W., *et al.*,

Plaintiffs,

15 Civ. 5273 (LTS) (HBP)

-against-

THE CITY OF NEW YORK, *et al.*,

Defendants.

**DECLARATION OF JULIE A. NORTH IN
SUPPORT OF NAMED PLAINTIFF CHILDREN'S
RENEWED MOTION FOR CLASS CERTIFICATION**

I, Julie A. North, declare the following:

1. I am a member of the law firm of Cravath, Swaine & Moore LLP ("Cravath"), co-counsel for Elisa W.; Alexandria R., by her next friend, Alison Max Rothschild; Thierry E., by his next friend, Amy Mulzer; Lucas T., Ximena T., Jose T.C. and Valentina T.C., by their next friend, Rachel Friedman; Ayanna J., by her next friend, Meyghan McCrea; Olivia and Ana-Maria R., by their next friend, Dawn Cardi; Xavion M., by his next friend, Michael B. Mushlin; Dameon C., by his next friend, Reverend Doctor Gwendolyn Hadley-Hall; Tyrone M., by his next friend, Bishop Lillian Robinson-Wiltshire; Brittney W., by her next friend, Yusuf El Ashmawy; Mikayla G., by her next friend, Amy Mulzer; Myls J. and Malik M., by their next friend, Elizabeth Hendrix; and Emmanuel S. and Matthew V., by their next friend, Samuel D. Perry, individually and on behalf of a class of all others similarly situated ("Plaintiff Children") in the above-captioned matter. I submit this Declaration in Support of Named Plaintiff Children's Renewed Motion for Class Certification.

2. The proposed class consists of children who are now or will be in the foster care custody of the Commissioner of New York City's Administration for Children's Services ("ACS") and two subclasses consisting of: (1) all children who have been in the custody of ACS

for more than two years, whose cases are entitled to “special scrutiny” by the Contract Agencies according to ACS policy; and (2) all children for whom Contract Agencies failed to assess and document at least every three months compelling reasons justifying the decision not to file a termination of parental rights petition after the children had been in care for 15 of the prior 22 months, a violation of ACS policy and the law.

A. Adequacy of Class Counsel

3. Cravath will provide adequate representation to the proposed class in this litigation in conjunction with A Better Childhood, Inc. (“ABC”).

4. Cravath has been counsel of record in a number of complex class action cases. These actions include large consolidated class actions, with multiple parties and various defendants, as well as single class actions against a single defendant. *See, e.g., In re Am. Int’l Group, Inc. 2008 Sec. Litig.*, No. 08-4772 (S.D.N.Y. filed May 21, 2008).

5. Cravath also has experience representing classes of plaintiffs in the public interest context. I have personally served as counsel in several class action lawsuits alleging violations of civil rights. *See, e.g., Duncan v. Michigan*, No. 07-000242 (Mich. Cir. Ct. County of Ingham filed Feb. 22, 2007); *White v. Martz*, No. CDV-2001-0133 (Mont. 1st Judicial Dist. Ct. Lewis and Clark County filed Feb. 14, 2002). Between 2007 and 2011, Cravath also represented a class of incarcerated prisoners with psychiatric disabilities in this court. *See Messiah S. v. Alexander*, No. 07-1327 (S.D.N.Y. filed Feb. 22, 2007).

6. As a result of my extensive experience and current research, I am knowledgeable about the applicable law, both in the Second Circuit and in federal courts nationally.

7. Cravath, working closely with ABC, has engaged in an in-depth investigation of the child welfare system in New York City and New York State. Hundreds of attorney hours

have been spent meeting with sources knowledgeable about the system, compiling and analyzing relevant facts and documentation and researching and developing legal claims alleged in Named Plaintiff Children's Amended Class Action Complaint for Injunctive and Declaratory Relief. Named Plaintiff Children have reviewed over one million pages, including the case files of each of the 19 Named Plaintiff Children, produced by City Defendant and over 260,000 pages produced by State Defendant and have taken 13 depositions of current and former employees of ACS and OCFS, and 11 depositions of representatives of each of the Contract Agencies who have or had a Named Plaintiff Child in their care. Counsel has also retained experts to opine on the significance of permanency in a child's development and to review the case records of Named Plaintiff Children. Cravath, along with ABC, is fully prepared to prosecute this matter on behalf of the Plaintiff Children in the proposed class.

8. Cravath will bring significant complex class action experience and expertise as well as sufficient resources to this litigation to provide adequate co-representation to the class.

B. Expert Reports

9. Attached hereto as Exhibit 1 is a true and correct copy of the Executive Summary of Dr. Caroline Long Burry, dated July 19, 2019. The Executive Summary of Dr. Caroline Long Burry also contains as appendices true and correct copies of the following: Dr. Caroline Long Burry's Case File Report of Thierry E. (Appendix A), Dr. Caroline Long Burry's Case File Report of Ayanna J. (Appendix B), Dr. Kathleen Coulborn Faller's Case File Report of Lucas T., Ximena T., Jose T.C. and Valentina T.C. (Appendix C), Dr. Robert Ortega's Case File Report of Tyrone M. (Appendix D), Gary Stauffer's Case File Report of Myls J. and Malik M. (Appendix E) and Gary Stauffer's Case File Report of Emmanuel S. and Matthew V. (Appendix F).

10. Attached hereto as Exhibit 2 is the Expert Report of Dr. David Brodzinsky, dated July 23, 2019.

C. Deposition Transcripts

11. Attached hereto as Exhibit 3 is a true and correct copy of excerpts from the transcript of the 30(b)(6) deposition of Karen Abreu-Rosano, as a corporate designee of SCO, taken on October 17, 2018.

12. Attached hereto as Exhibit 4 is a true and correct copy of excerpts from the transcript of the deposition of Beverly Ali, Assistant Commissioner of Family Team Conferencing (ACS), taken on March 25, 2019.

13. Attached hereto as Exhibit 5 is a true and correct copy of excerpts from the transcript of the 30(b)(6) deposition of Audrey Erazo, as a corporate designee of Cardinal McCloskey, taken on October 30, 2018.

14. Attached hereto as Exhibit 6 is a true and correct copy of excerpts from the transcript of the deposition of Julie Farber, Deputy Commissioner of Family Permanency Services (ACS), taken on March 28, 2019.

15. Attached hereto as Exhibit 7 is a true and correct copy of excerpts from the transcript of the deposition of Ronni Fuchs, Regional Director, New York City Regional Office (OCFS), taken on April 2, 2019.

16. Attached hereto as Exhibit 8 is a true and correct copy of excerpts from the transcript of the deposition of Lisa Ghartey Ogundimu, Acting Deputy Commissioner, Child Welfare and Community Services (“CWCS”) (OCFS), taken on April 15, 2019.

17. Attached hereto as Exhibit 9 is a true and correct copy of excerpts from the transcript of the 30(b)(6) deposition of Shanna Gonzalez, as a corporate designee of HeartShare St. Vincent's Services, taken on November 9, 2018.

18. Attached hereto as Exhibit 10 is a true and correct copy of excerpts from the transcript of the deposition of Renee Hallock, Associate Commissioner, Office of Prevention, Permanency and Program Support, CWCS (OCFS), taken on April 12, 2019.

19. Attached hereto as Exhibit 11 is a true and correct copy of excerpts from the transcript of the 30(b)(6) deposition of Corinne Hammons, as a corporate designee of Little Flower, taken on November 7, 2018.

20. Attached hereto as Exhibit 12 is a true and correct copy of excerpts from the transcript of the 30(b)(6) deposition of Lavern Harry, as a corporate designee of Graham Windham, taken on October 31, 2018.

21. Attached hereto as Exhibit 13 is a true and correct copy of excerpts from the transcript of the 30(b)(6) deposition of Ann McCabe, as a corporate designee of Catholic Guardian Services, taken on October 29, 2018.

22. Attached hereto as Exhibit 14 is a true and correct copy of excerpts from the transcript of the 30(b)(6) deposition of Nardine McLeod, as a corporate designee of Edwin Gould, taken on August 30, 2018.

23. Attached hereto as Exhibit 15 is a true and correct copy of excerpts from the transcript of the 30(b)(6) deposition of Alexandria Munoz, as a corporate designee of Coalition for Hispanic Family Services, taken on November 15, 2018.

24. Attached hereto as Exhibit 16 is a true and correct copy of excerpts from the transcript of the deposition of David Nish, Associate Commissioner of Training and Workforce Development (ACS), taken on May 15, 2019.

25. Attached hereto as Exhibit 17 is a true and correct copy of excerpts from the transcript of the 30(b)(6) deposition of Daniela Pogue, as a corporate designee of Children's Village, taken on November 6, 2018.

26. Attached hereto as Exhibit 18 is a true and correct copy of excerpts from the transcript of the deposition of Shelia Poole, Acting Commissioner (OCFS), taken on May 6, 2019.

27. Attached hereto as Exhibit 19 is a true and correct copy of excerpts from the transcript of the 30(b)(6) deposition of Carla Riccobono, as a corporate designee of NAC, taken September 27, 2018.

28. Attached hereto as Exhibit 20 is a true and correct copy of excerpts from the transcript of the deposition of Alan Sputz, Deputy Commissioner of Family Court Legal Services (ACS), taken on March 26, 2019.

29. Attached hereto as Exhibit 21 is a true and correct copy of excerpts from the transcript of the deposition of Laura Velez, former Deputy Commissioner, Child Welfare and Community Services (OCFS), taken April 29, 2019.

30. Attached hereto as Exhibit 22 is a true and correct copy of excerpts from the transcript of the deposition and errata of Andrew White, Deputy Commissioner of Policy, Planning and Measurement (ACS), taken on April 3, 2019.

31. Attached hereto as Exhibit 23 is a true and correct copy of excerpts from the transcript of the 30(b)(6) deposition of Lyschel Wilkerson, as a corporate designee of Seamen's Society, taken November 1, 2018.

D. Produced Documents

32. Attached hereto as Exhibit 24 is a true and correct copy of a Patient Discharge Report from Kings County Hospital Center Emergency Department, dated December 23, 2009, bearing Bates number NYC_00006428.

33. Attached hereto as Exhibit 25 is a true and correct copy of a Court Action Summary, dated January 11, 2016, bearing Bates number NYC_00030593.

34. Attached hereto as Exhibit 26 is a true and correct copy of Family Services Progress Notes, dated September 4, 2015, bearing Bates number NYC_00046087.

35. Attached hereto as Exhibit 27 is a true and correct copy of excerpts from Purchase of Regular Residential Care Services, dated February 23, 2011, bearing Bates number NYC_00143688.

36. Attached hereto as Exhibit 28 is a true and correct copy of the ACS Permanency Planning Policy and Procedure, dated April 5, 2013, bearing Bates number NYC_00216448.

37. Attached hereto as Exhibit 29 is a true and correct copy of the ACS Permanency Planning Policy and Procedure with Permanency Planning Policy Highlights, dated April 5, 2013, bearing Bates number NYC_00216470.

38. Attached hereto as Exhibit 30 is a true and correct copy of Children's Services Office of Family Permanency Team Conferencing Protocol Phase II, dated April 1, 2009, bearing Bates number NYC_00217065.

39. Attached hereto as Exhibit 31 is a true and correct copy of the ACS Foster Care Quality Assurance Standards, dated April 2011, bearing Bates number NYC_00218423.

40. Attached hereto as Exhibit 32 is a true and correct copy of ACS Placement System Talking Points, bearing Bates number NYC_00228773.

41. Attached hereto as Exhibit 33 is a true and correct copy of an ACS Performance Evaluation Meeting Summary Report, dated January 29, 2016, bearing Bates number NYC_00228933.

42. Attached hereto as Exhibit 34 is a true and correct copy of Improved Outcomes for Children: 2015 ACS Re-Approval Report, dated March 12, 2016, bearing Bates number NYC_00230135.

43. Attached hereto as Exhibit 35 is a true and correct copy of the ACS Trial Discharge Review Initiative, dated November 5, 2015, bearing Bates number NYC_00230435.

44. Attached hereto as Exhibit 36 is a true and correct copy of a Little Flower Psychosocial Evaluation, dated September 24, 2010, bearing Bates number NYC_00256986.

45. Attached hereto as Exhibit 37 is a true and correct copy of an OCFS Child Protective Services Intake Report, dated October 18, 2016, bearing Bates number NYC_00279767.

46. Attached hereto as Exhibit 38 is a true and correct copy of the Fostering Change for Children: Permanency Coaching Program, bearing Bates number NYC_00399970.

47. Attached hereto as Exhibit 39 is a true and correct copy of Improved Outcomes for Children: 2014 ACS Re-Approval Report, dated December 23, 2014, bearing Bates number NYC_00408449.

48. Attached hereto as Exhibit 40 is a true and correct copy of the Assessment of Improved Outcomes for Children, dated May 20, 2014, bearing Bates number NYC_00408786.

49. Attached hereto as Exhibit 41 is a true and correct copy of Proposed Restructuring and Resources to Achieve Improved Outcomes for Children in Foster Care, dated October 2015, bearing Bates number NYC_00469050.

50. Attached hereto as Exhibit 42 is a true and correct copy of the Casey Family Programs 2015 Work Plan/Q3 Quarterly Progress Report, dated January 7, 2015, bearing Bates number NYC_00476436.

51. Attached hereto as Exhibit 43 is a true and correct copy of an email from B. Doran to A. White, *et al.*, dated October 20, 2015, bearing Bates number NYC_00510045.

52. Attached hereto as Exhibit 44 is a true and correct copy of the ACS Improved Outcomes for Children Implementation Plan, dated February 13, 2009, bearing Bates number NYC_00512621.

53. Attached hereto as Exhibit 45 is a true and correct copy of the Family Permanency Services New Needs and Savings Draft Major System Reform Initiatives Requests, dated October 8, 2015, bearing Bates number NYC_00523165.

54. Attached hereto as Exhibit 46 is a true and correct copy of IOC Workgroup Meeting Minutes, dated September 16, 2015, bearing Bates number NYC_00528985.

55. Attached hereto as Exhibit 47 is a true and correct copy of the No Time to Wait Initiative Description, bearing Bates number NYC_00534844.

56. Attached hereto as Exhibit 48 is a true and correct copy of an email from T. John to D. Smith, dated May 29, 2012, bearing Bates number NYC_00587902.

57. Attached hereto as Exhibit 49 is a true and correct copy of ACS Family Permanency Services Division: Initial Assessment and Priorities, dated September 2015, bearing Bates number NYC_00598525.

58. Attached hereto as Exhibit 50 is a true and correct copy of the spreadsheet of Selected Major ACS Child Welfare System Reform Projects Currently Underway, dated March 2016, bearing Bates number NYC_00613600.

59. Attached hereto as Exhibit 51 is a true and correct copy of the Placement Module – Major Placement Issues and Recommendations, bearing Bates number NYC_00619358.

60. Attached hereto as Exhibit 52 is a true and correct copy of PPM Hot Issues, bearing Bates number NYC_00638264.

61. Attached hereto as Exhibit 53 is a true and correct copy of an email from K. Smith to N. Belson, *et al.*, dated August 14, 2014, bearing Bates number NYC_00640622.

62. Attached hereto as Exhibit 54 is a true and correct copy of a letter from S. Poole to G. Carrión, Esq., dated June 9, 2015, bearing Bates number NYC_00653113.

63. Attached hereto as Exhibit 55 is a true and correct copy of the Policy Report: Foster Care Part II – Improving Foster Care in New York City, dated June 2015, bearing Bates number NYC_00658328.

64. Attached hereto as Exhibit 56 is a true and correct copy of the ACS Foster Care Directors' Meeting Notes, dated October 16, 2015, bearing Bates number NYC_00665755.

65. Attached hereto as Exhibit 57 is a true and correct copy of the Office of Placement Administration Re-Design – Update, dated September 11, 2012, bearing Bates number NYC_00677272.

66. Attached hereto as Exhibit 58 is a true and correct copy of the One-on-One with Julie Farber: Ina Mendez Updates, dated December 15, 2015, bearing Bates number NYC_00755719.

67. Attached hereto as Exhibit 59 is a true and correct copy of ACS Placement Stability: Redesign of the Placement Process Deck, bearing Bates number NYC_00842274.

68. Attached hereto as Exhibit 60 is a true and correct copy of a Family Assessment and Service Plan, dated July 27, 2012, bearing Bates number NYC_00899903.

69. Attached hereto as Exhibit 61 is a true and correct copy of Moving the Dial: Reflecting on Initial Insights from the Rapid Permanency Reviews for Catholic Guardian, dated September 6, 2016, bearing Bates number NYC_00904599.

70. Attached hereto as Exhibit 62 is a true and correct copy of the ACS Child Welfare Programs' Integrated Family Team Conference Policy, dated February 21, 2017, bearing Bates number NYC_00905494.

71. Attached hereto as Exhibit 63 is a true and correct copy of the Cardinal McCloskey CoQI: FY17 Annual Data Sheet for Foster Care, dated May 5, 2017, bearing Bates number NYC_01055788.

72. Attached hereto as Exhibit 64 is a true and correct copy of the ACS FY 2016 Foster Care Scorecard, dated April 3, 2017, bearing Bates number NYC_01069277.

73. Attached hereto as Exhibit 65 is a true and correct copy of the draft Committee: Strengthening Reunification Efforts, dated January 28, 2016, bearing Bates number NYC_01095300.

74. Attached hereto as Exhibit 66 is a true and correct copy of an email from J. Roth to B. Miller, dated June 9, 2015, bearing Bates number NYC_01099698.

75. Attached hereto as Exhibit 67 is a true and correct copy of Strengthening Reunification: GANNT Chart Creation, dated September 30, 2015, bearing Bates number NYC_01099783.

76. Attached hereto as Exhibit 68 is a true and correct copy of Improved Outcomes for Children: 2017 ACS Re-Approval Report and Request, dated August 2017, bearing Bates number NYC_01106530.

77. Attached hereto as Exhibit 69 is a true and correct copy of an FPS Monthly Report, dated June 2016, bearing Bates number NYC_01123577.

78. Attached hereto as Exhibit 70 is a true and correct copy of Monthly Status Reports: August 2017-September 2018, bearing Bates number NYC_01134168.

79. Attached hereto as Exhibit 71 is a true and correct copy of Division of Family Permanency Services – Strategic Plan Accomplishments, bearing Bates number NYC_01134449.

80. Attached hereto as Exhibit 72 is a true and correct copy of a Strong Families NYC Citywide Implementation Team Meeting Deck, dated February 21, 2018, bearing Bates number NYC_01140160.

81. Attached hereto as Exhibit 73 is a true and correct copy of an ACS Performance Evaluation Meeting Summary Report, dated April 16, 2018, bearing Bates number NYC_01142225.

82. Attached hereto as Exhibit 74 is a true and correct copy of an email from R. Martinez to M. Burgos, *et al.*, dated June 18, 2018, bearing Bates number NYC_01143984.

83. Attached hereto as Exhibit 75 is a true and correct copy of FCLS Strategic Plan: Division of Family Court Legal Services, dated March 2016, bearing Bates number NYC_01152900.

84. Attached hereto as Exhibit 76 is a true and correct copy of excerpts from undated ACS spreadsheets, bearing Bates number NYC_01153058.

85. Attached hereto as Exhibit 77 is a true and correct copy of excerpts from undated ACS spreadsheets, bearing Bates number NYC_01153059.

86. Attached hereto as Exhibit 78 is a true and correct copy of excerpts from undated ACS spreadsheets, bearing Bates number NYC_01153060.

87. Attached hereto as Exhibit 79 is a true and correct copy of ACS Family Team Conferencing: A Learning Program for NYC Child Welfare Professionals, bearing Bates number NYC_01153061.

88. Attached hereto as Exhibit 80 is a true and correct copy of NYC Rapid Permanency Reviews Close Out Meeting: Lessons Learned and Next Steps, dated July 26, 2018, bearing Bates number NYC_01154247.

89. Attached hereto as Exhibit 81 is a true and correct copy of FPS/PPM Quarterly Data Review Meeting – Permanency, dated March 19, 2018, bearing Bates number NYC_01154930.

90. Attached hereto as Exhibit 82 is a true and correct copy of Improved Outcomes for Children: 2018 ACS Re-Approval Report, dated November 1, 2018, bearing Bates number NYC_01155035.

91. Attached hereto as Exhibit 83 is a true and correct copy of ACS spreadsheets containing data on voluntary agency performance, bearing Bates number NYC_01155085.

92. Attached hereto as Exhibit 84 is a true and correct copy of No Time to Wait/Home Away from Home Meeting Notes, dated September 17, 2018, bearing Bates number NYC_01158095.

93. Attached hereto as Exhibit 85 is a true and correct copy of No Time to Wait: FY19 Progress Toward Targets and Analysis of Reunification Data, dated February 1, 2019, bearing Bates number NYC_01158154.

94. Attached hereto as Exhibit 86 is a true and correct copy of the Voluntary Agency Review Process Guidelines for Regional Office Staff, dated August 4, 2016, bearing Bates number STATE_0000001532.

95. Attached hereto as Exhibit 87 is a true and correct copy of a letter from G. Carrión, Esq. to J. Mattingly, dated June 30, 2010, bearing Bates number STATE_0000007995.

96. Attached hereto as Exhibit 88 is a true and correct copy of an email from L. Velez to R. Toomer forwarding email from G. Carrión, Esq. to L. Velez and S. Poole, dated April 30, 2014, bearing Bates number STATE_0000021664.

97. Attached hereto as Exhibit 89 is a true and correct copy of the No Time to Wait Advisory Board Update Deck, dated March 13, 2015, bearing Bates number STATE_0000051734.

98. Attached hereto as Exhibit 90 is a true and correct copy of the Rapid Permanency Reviews Overview, dated June 1, 2016, bearing Bates number STATE_0000055524.

99. Attached hereto as Exhibit 91 is a true and correct copy of the ACS Improved Outcomes for Children Implementation Plan, dated January 30, 2009, bearing Bates number STATE_0000077809.

100. Attached hereto as Exhibit 92 is a true and correct copy of the ACS Child Welfare Programs' Integrated Family Team Conference Policy, dated October 24, 2016, bearing Bates number STATE_0000089604.

101. Attached hereto as Exhibit 93 is a true and correct copy of Placements Project Charter: ACS Requirements, dated April 21, 2017, bearing Bates number STATE_0000100090.

102. Attached hereto as Exhibit 94 is a true and correct copy of an email from R. Fuchs to S. Sousa, dated January 3, 2014, bearing Bates number STATE_0000183909.

103. Attached hereto as Exhibit 95 is a true and correct copy of the Final Foster Care PAMS Questions Definitions Document, dated August 2017, bearing Bates number STATE_0000197978.

104. Attached hereto as Exhibit 96 is a true and correct copy of the ACS FY 2018 Foster Care Scorecard, dated August 15, 2017, bearing Bates number STATE_0000200872.

105. Attached hereto as Exhibit 97 is a true and correct copy of the March 18, 2016 Voluntary Agency Quarterly Site Visit Report (NAC), dated September 2, 2016, bearing Bates number STATE_0000219387.

106. Attached hereto as Exhibit 98 is a true and correct copy of the May 13, 2016 Voluntary Agency Quarterly Site Visit Report (NAC), dated September 2, 2016, bearing Bates number STATE_0000219388.

107. Attached hereto as Exhibit 99 is a true and correct copy of an email from R. Fuchs to C. Szulborski, dated March 20, 2017, bearing Bates number STATE_0000254491.

108. Attached hereto as Exhibit 100 is a true and correct copy of OCFS CFSR Round 3 Wave 4 spreadsheets, bearing Bates number STATE_0000263120.

109. Attached hereto as Exhibit 101 is a true and correct copy of the Child Welfare Waiver Demonstration Semi-Annual Progress Report, dated January 25, 2019, bearing Bates number STATE_0000263313.

110. Attached hereto as Exhibit 102 is a true and correct copy of the CFSR Round 3 Performance Outcomes by Indicator and Wave, dated August 27, 2018, bearing Bates number STATE_0000263766.

E. Other Documents

111. Attached hereto as Exhibit 103 is a true and correct copy of the About the New York State Office of Children and Family Services (OCFS): Mission Statement, <https://ocfs.ny.gov/main/about/>, last visited July 30, 2019.

112. Attached hereto as Exhibit 104 is a true and correct copy of the Data/Policy, NYC Admin. for Child. Services, <http://www1.nyc.gov/site/acs/about/data-policy.page>, last visited July 30, 2019.

113. Attached hereto as Exhibit 105 is a true and correct copy of Child Welfare: Implementation of the Adoption and Safe Families Act (P.L. 105-89), dated November 8, 2004.

114. Attached hereto as Exhibit 106 is a true and correct copy of the Child and Family Services Review: Arizona Final Report, dated December 2015.

115. Attached hereto as Exhibit 107 is a true and correct copy of the Child and Family Services Review: New York Final Report, dated 2016.

116. Attached hereto as Exhibit 108 is a true and correct copy of N.Y.C. Dep't of Investigation, Report on ACS Policy and Practice Violations Identified in Three Child Welfare Cases and Related Analysis of Certain Systemic Data, dated May 3, 2016.

117. Attached hereto as Exhibit 109 is a true and correct copy of the Suffolk County Supreme Court Special Grand Jury Report CPL § 190.85(1)(C), dated January 26, 2017.

118. Attached hereto as Exhibit 110 is a true and correct copy of the DHHS Child Welfare Outcomes Report Data on Children Maltreated While in Foster Care, dated 2017.

119. Attached hereto as Exhibit 111 is a true and correct copy of the New Jersey Department of Children and Families Workforce Report: 2016-2017 Updates.

120. Attached hereto as Exhibit 112 is a true and correct copy of the article “Inwood House Merges with The Children’s Village,” dated January 2017.

121. Attached hereto as Exhibit 113 is a true and correct copy of Supporting Lifelong Families: Ensuring Long-Lasting Permanency and Well-Being, dated April 2017.

122. Attached hereto as Exhibit 114 is a true and correct copy of the FY2018 Foster Care Strategic Blueprint Status Report, dated 2018.

123. Attached hereto as Exhibit 115 is a true and correct copy of the N.Y. State Office of the Comptroller, Health and Safety of Children in Foster Care, dated March 2018.

124. Attached hereto as Exhibit 116 is a true and correct copy of the article “After 187 Years, Leake & Watts Rebrands and Changes its Name to Rising Ground,” dated April 24, 2018.

125. Attached hereto as Exhibit 117 is a true and correct copy of the ACS Foster Care Strategic Blueprint FY2019-FY2023 & Findings from the Rapid Permanency Reviews, dated May 2018.

126. Attached hereto as Exhibit 118 is a true and correct copy of the article “Rising Ground & Edwin Gould – A New Day,” dated August 16, 2018.

127. Attached hereto as Exhibit 119 is a true and correct copy of N.Y.C. Dep't of Investigation, Review of ACS' Systemic Safety Accountability Mechanisms for Foster Care Providers, dated October 12, 2018.

128. Attached hereto as Exhibit 120 is a true and correct copy of the Preliminary Mayor's Management Report, dated February 2019.

129. Attached hereto as Exhibit 121 is a true and correct copy of the N.Y.C. Office of the Comptroller, Audit Report on the Oversight of the Administration for Children's Services' Certification Process for Foster Parents, dated May 3, 2019.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 30th day of July 2019, at New York, New York.

 EW

Julie A. North